

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

CARRIE CONLEY et al.,

*Plaintiffs,*

v.

ALAN HIRSCH et al.,

*Defendants.*

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JEFFERSON GRIFFIN,

*Plaintiff,*

v.

NORTH CAROLINA STATE BOARD OF  
ELECTIONS,

*Defendant,*

and

ALLISON RIGGS et al.,

*Intervenor-Defendants.*

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NORTH CAROLINA DEMOCRATIC  
PARTY,

*Plaintiff,*

v.

NORTH CAROLINA STATE BOARD OF  
ELECTIONS et al.,

*Defendants.*

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Case Nos.    5:25-cv-00193-M  
                  5:24-cv-00731-M (lead)  
                  5:24-cv-00699-M

**VOTER PLAINTIFFS' RESPONSE TO  
APRIL 30 ORDER**

## **VOTER PLAINTIFFS' RESPONSE TO APRIL 30 ORDER**

Plaintiffs Carrie Conley, Lockhart Webb, Ella Kromm, Gabriela Adler-Espino, and the League of Women Voters of North Carolina (Voter Plaintiffs) submit the following in response to the Order issued by this Court on April 30, 2025, ECF 113:

1. Voter Plaintiffs do not believe there are any material facts that remain genuinely in dispute. Voter Plaintiffs have attached to this filing their statement of undisputed facts. Exhibit A (Voter Plaintiffs' Statement of Undisputed Facts).

2. Voter Plaintiffs have no objection to the court treating the parties' briefing as cross-motions for summary judgment.

3. Voter Plaintiffs do not require more time to come forward with additional evidence. Voter Plaintiffs note that, given the unique procedural posture of this case and in the interests of judicial efficiency, they have not yet filed a motion to certify their proposed Class. *See Conley v. Hirsch*, No. 5:25-cv-00193, ECF 1 at ¶¶ 181-190. However, they are prepared to expeditiously file their motion upon the Court's request.

Dated: May 2, 2025

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Respectfully Submitted,

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\*By special appearance or notice of special  
appearance forthcoming

### **CERTIFICATE OF SERVICE**

On this 2nd day of May, 2025, I electronically filed the foregoing document using the court's CM/ECF system.

/s/ Samuel Jacob Davis  
Samuel Jacob Davis